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April 21, 2017

Via Facsimile

Hon. Jesse M. Furman
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: US v. Jacob Chait
17 Cr. 105

Dear Judge Furman,

Please accept this letter-motion as a request for a 60-day extension of time to file defense motions. As Your Honor may recall, I was appointed to represent Jacob Chait on February 27, 2017, on the date of his arraignment. The Government has provided the defense with approximately 20,000 PDF files and recordings, and has just provided additional document discovery today. In addition, the government is in the process of imaging 20 seized electronic devices, including many computers, for the defense. We anticipate that once this process is complete, it will take the defense awhile to review this evidence. At the arraignment, Your Honor set April 28, 2017 as the date that defense motions are currently due. We are respectfully requesting a 60-day extension of time to file pretrial motions, until June 27, 2017, to give the government time to produce the images, and the defense ample time to review the imaged evidence. There have been no previous requests by the defense, and AUSAs Elizabeth Hanft and Richard Udell have no objection to this request. Your Honor had set a status conference date of May 24, 2017. The defense agrees to exclude the time from May 24, 2017 until June 27, 2017, under the Speedy Trial Act, 18 U.S.C. § 3161.

Respectfully submitted,

s/ Lorraine Gauli-Rufo
Lorraine Gauli-Rufo, Esq.

Attorney for Jacob Chait

Cc: Elizabeth Hanft, Esq., AUSA
Richard Udell, Esq., AUSA

Counsel is reminded that, per the Court's Individual Rules and Practices, motions of this sort must be made by letter motion filed on ECF (unless there is a basis to request that the letter be sealed, which there is not here). Nevertheless, the application is GRANTED. The deadline to file pretrial motions is extended to June 27, 2017; any opposition shall be filed by July 11, 2017; and any reply shall be filed by July 18, 2017. The pretrial conference scheduled for May 24, 2017, is ADJOURNED to July 25, 2017, at 3:45 p.m. Time is excluded under the Speedy Trial Act between today and July 25, 2017; the Court finds that that the purposes of excluding that time outweigh the interests of the defendant and the public in a speedy trial because it will allow the defendant to review discovery and make any motions that he intends to bring.

SO ORDERED.

A handwritten signature in black ink, appearing to read "Jacob Chait", with a stylized, flowing script.

April 24, 2017